

UNITED STATES DISTRICT COURT

for the
Western District of WashingtonIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)GOOGLE USER ACCOUNT:
ponymoversllc@gmail.com

Case No. MJ18-417

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A2, which is attached hereto and incorporated herein by this reference.

located in the Northern District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B2, which is attached hereto and incorporated herein by this reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

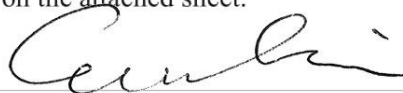
The search is related to a violation of:

Code Section	Offense Description
Title 18 U.S.C. §§ 1956(a)(1) (A)(i), (B)(i); and Title 21 U.S.C. §§ 841(a)(1) and 846	Money Laundering; Conspiracy to Distribute and Distribution of a Controlled Substance

The application is based on these facts:

See Affidavit of SA Eric K. Chin, which is attached hereto and incorporated herein by this reference.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Eric K. Chin, Special Agent, DEA

Printed name and title

Sworn to before me pursuant to Crim.Rule 4.1.

Date: 09/06/2018



Judge's signature

City and state: Seattle, Washington

Hon. Brian A. Tsuchida, Chief U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

STATE OF WASHINGTON)

) ss

COUNTY OF KING)

I, ERIC K. CHIN, a Special Agent with Drug Enforcement Administration, Seattle, Washington, having been duly sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (SA) with the United States Drug Enforcement Administration (DEA), and have been employed since July, 2016. I am currently assigned to the DEA Seattle Field Division. In this capacity, I investigate violations of the Controlled Substances Act, Title 21, United States Code, Section 801, *et seq.*, and related offenses. I have received specialized training in the enforcement and investigation of the Controlled Substance Act. I have received over 720 hours of classroom and field training including but not limited to, drug identification, interdiction, detection, money laundering techniques and schemes, smuggling, and the investigation of individuals and/or organizations involved in the illegal possession, possession for sale, importation, smuggling, cultivation, manufacturing, and illicit trafficking of controlled substances. Since the time I was assigned to the DEA Seattle Field Division, I have contributed to numerous narcotics investigations under the direct supervision of senior Special Agents, including investigations involving the trafficking of heroin, cocaine, marijuana, and methamphetamine. I have also been involved in the execution of search warrants, arrests, and have interviewed drug traffickers and informants regarding the illicit trafficking of controlled substance. Because of my training and experience, I am familiar with common methods of investigating drug trafficking and manufacturing organizations, and have become familiar with the methods of operation of drug traffickers and manufacturers, including their methods of importing, exporting, storing, concealing, and packaging drugs; their methods of transferring and distributing drugs,

1 their use of cellular telephones; their use of numerical codes, code words, and counter
2 surveillance; and other methods of avoiding detection of law enforcement.

3 **PURPOSE OF THIS AFFIDAVIT**

4 2. This affidavit is made in support of an application for a search warrant
5 pursuant to Title 18, United States Code, Sections 2703(a), 2703(b)(1)(A), and
6 2703(c)(1)(A), to compel Yahoo! Inc., located at 701 First Ave., Sunnyvale, California
7 94089, and Google LLC, located at 1600 Amphitheatre Parkway, Mountain View,
8 California 94043 – providers of electronic communication and remote computing
9 services – to provide, for the period of January 1, 2017, to the present, subscriber
10 information, records, and the contents of wire and electronic communications pertaining
11 to the accounts:

12 a. **michaelyang89@yahoo.com** (Yahoo! Inc.); and
13 b. **ponymoversllc@gmail.com** (Google LLC);
14 (hereinafter referred to collectively as **SUBJECT ACCOUNTS**) more fully described in
15 Attachments A1 (yahoo.com) and A2 (gmail.com), attached hereto and incorporated
16 herein, as well as all other subscriber and log records associated with **SUBJECT**
17 **ACCOUNTS**, to seize the items listed in Attachments B1 (yahoo.com) and B2
18 (gmail.com), attached hereto and incorporated herein, for evidence, fruits, and
19 instrumentalities of violations of Title 18, United States Code, Sections 1956(a)(1)(A)(i)
20 and (B)(i), laundering of monetary instruments; and Title 21, United States Code,
21 Sections 841(a)(1) and 846, distribution and conspiracy to distribute controlled
22 substances.

23 3. The facts set forth in this Affidavit are based on my own personal
24 knowledge; knowledge obtained from other individuals during my participation in this
25 investigation, including other law enforcement officers; review of documents and records
26 related to this investigation; communications with others who have personal knowledge
27 of the events and circumstances described herein; and information gained through my
28 training and experience.

4. This affidavit is intended to show that there is probable cause to search the **SUBJECT ACCOUNTS** and does not purport to set forth each and every fact that I, or others, have learned, nor all of my knowledge of, or investigation into, this matter. I have set forth only the facts that I believe are relevant to the determination of probable cause to believe that evidence, fruits, and instrumentalities of violations of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (B)(i), laundering of monetary instruments; and Title 21, United States Code, Sections 841(a)(1) and 846, distribution and conspiracy to distribute controlled substances, will be found in the **SUBJECT ACCOUNTS**.

5. This application is being presented by electronic means pursuant to Local Criminal Rule CrR 41(d)(3).

STATEMENT OF PROBABLE CAUSE

Identification of Marijuana Shipments from Washington State to New York

6. On May 2, 2016, HSI Border Enforcement Security Taskforce (BEST) Seattle agents received information from a Seattle area freight forwarder who reported that he had discovered marijuana in two pallets that he had been contracted to ship to Flushing, NY.

7. On May 5, 2016, after conducting further investigation related to the crates – to include a positive alert from a drug-detecting canine – HSI BEST Seattle and DEA Seattle secured a warrant to search the two shipping crates. *MJ16-206*, W.D. Wa. May 5, 2016. When the search was executed, law enforcement recovered approximately 556.6 pounds of marijuana.

QIFENG LI Drug Trafficking Organization Identified

8. On May 13, 2016, investigators from HSI and DEA, established surveillance at the Great Wall Shopping Mall, located at 18230 East Valley Hwy., Kent, WA. This surveillance was conducted based on information received from a DEA

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Confidential Source¹ that members of a Seattle-based marijuana drug trafficking organization (DTO) were supposed to meet at that location.

9. Two of the individuals that attended this meeting were identified as QIFENG LI and QIWEI LI. The vehicle that they used to travel to this meeting was a 2015 Toyota Camry with Washington plates AWP6688 (“AWP6688”). Record checks revealed that AWP6688 was registered to QIFENG LI at 12065 70th Ave. S., Seattle, WA.

10. Throughout the latter half of 2016 and beginning of 2017, agents identified several homes that were owned by QIFENG LI or QIWEI LI that were suspected of being used for largescale indoor marijuana production due to – among other reasons – abnormally high electricity usage.²

Seizure of Marijuana Shipment bound for New York on May 1, 2017

11. On May 1, 2017, at approximately 10:00 a.m., HSI investigators established surveillance at 15735 143rd Ave. SE, Renton, WA – the residence of QIFENG LI, QIWEI LI (brother of QIFENG LI), and XIAMIN HUANG (spouse of QIFENG LI). Observed parked at or near the property were AWP6688, *i.e.*, the Camry registered to QIFENG LI, a Mercedes-Benz Van (C01021H),³ and a Toyota SUV (AOJ6868).

¹ The source’s principal motivation for working with law enforcement was to avoid federal charges for drug trafficking and related offenses. The source is no longer working with the government. However, given his/her cooperation, the government did not charge the source with any criminal offense. During the time the source cooperated with the government, he/she was not paid and was not motivated by potential immigration benefits.

² Due to the substantial amount of electricity that is necessary to power the lights, fans, *etc.*, associated with an indoor marijuana grow operation, based upon SA Chin’s training and experience, and the training and experience of other law enforcement officers with whom he has spoken, a significant increase in electricity consumption over historical amounts is a key indicator that a residence has been modified and is being used for largescale indoor marijuana production.

³ This vehicle was purchased by QIWEI LI on or about August 30, 2016. Based upon records obtained from a Washington Department of Licensing (WA DOL) database and Mercedes-Benz

12. At approximately 10:51 a.m., investigators observed C01021H, believed to be driven by QIWEI LI, drive to a multi-business parking lot located on the northeast corner of the intersection of Union Ave. NE and NE 4th St. in Renton, Washington.

13. At approximately 11:05 a.m., a black Ford truck with Washington plates C96609J, driven by an Asian male later identified as Bin Zhu, parked next to C01021H. Law enforcement observed QIWEI LI and ZHU transfer two large brown boxes from the cargo area of C01021H to the truck bed of C96609J. Following the transfer of the cargo, C96609J departed the parking lot and drove across the street to the United States Postal Service (“USPS”) office located at 4301 NE 4th St., Renton, WA.

14. Law enforcement observed ZHU remove the boxes that he had just received from QIWEI LI and take them inside the USPS office. While waiting in line with Bin Zhu at the USPS office, HSI SA Andrew Turner observed a shipping label on the boxes that indicated that the shipment was destined for Brooklyn, NY. Bin Zhu was then observed tendering the parcels for shipment.

15. Upon further inspection, law enforcement learned that the shipment consisted of two large boxes each measuring 20" x 20" x 20", with a combined weight of approximately 84 pounds and 2 ounces. The shipment was addressed to "B&H Sportwear, 540 President St., Brooklyn, NY 11215" and had the return address of "West Sport Club, 17608 112th Ave. SE, Renton, WA 98055."

16. On May 11, 2016, HSI TFO Brett Willyerd, applied for, and obtained, a federal search warrant for this shipment. *MJ17-201*, W.D. Wa., May 11, 2017. Upon execution of the search, it was discovered that both boxes were identically packaged. Contained within each box was an inner box wrapped in cellophane and aluminum foil with rubber matting and dryer sheets layered between the two boxes. The cellophane and aluminum foil wrapped inner box contained several bundles of a green leafy material,

Financial Services, upon purchase, the vehicle was registered at a QIWEI LI-owned property suspected of being used for indoor marijuana production.

1 suspected to be marijuana. Each bundle of suspected marijuana was in a clear plastic bag
2 that was contained within two separate vacuum-sealed FoodSaver bags. In total, the
3 shipment contained 46 bundles of suspected marijuana with a combined weight of
4 approximately 52 pounds.

5 **Identification of Suspected Marijuana Shipment from Seattle to New York on**
6 **August 8, 2017.**

7 17. On August 8, 2017, Seattle DEA and HSI investigators initiated
8 surveillance on QIFENG LI at his residence located at 15735 143rd Ave. SE, Renton,
9 WA. At approximately 11:23 a.m., DEA SA Eric Chin witnessed QIFENG LI exit his
10 residence and enter a white 2016 Mercedes-Benz van with Washington plates C01021H,
11 *i.e.*, the vehicle associated with the previous seizure of suspected marijuana on May 1,
12 2017. During the surveillance, investigators following QIFENG LI to the Renton
13 Highlands Public Library located at 2801 NE 10th St., Renton, WA.

14 18. QIFENG LI arrived at the Renton Highlands Public Library at
15 approximately 12:27 p.m. Several minutes after QIFENG LI arrived at the library, SA
16 Chin went inside the library to locate QIFENG LI. Once inside the library, SA Chin
17 observed QIFENG LI sitting at a public computer creating a freight shipping label on the
18 website for "YRC Freight."

19 19. At approximately 12:45 p.m., QIFENG LI departed the library with several
20 print-outs of the shipping label. QIFENG LI returned to C01021H and drove directly to
21 680 Edmonds Ave. NE, Renton, WA.

22 20. At approximately 1:59 p.m., QIFENG LI and an unidentified Asian male –
23 later identified as Man Fung Lee – exited the residence and entered C01021H. SA Daniel
24 Murphy then witnessed C01021H depart the residence with QIFENG LI driving.

25 21. At approximately 2:42 p.m., investigators observed C01021H arriving at
26 YRC Freight located at 12855 48th Ave. S., Tukwila, WA. At approximately 2:50 p.m.,
27 law enforcement observed QIFENG LI depart YRC freight in C01021H.
28

22. After QIFENG LI departed, TFO Bruch, SA Turner, and SA Chin entered YRC Freight. YRC Freight Security Investigator J.H. told investigators that three wooden crates had just been dropped off for shipment to “QR TRADING INC., Attn: JIANG LI” and that the recipient’s address was 23 Cypress Ave, Brooklyn, NY 11237. The shipper’s name was listed as “KC Fine Cabinetry” and the shipper’s address was listed as “11801 NE 160th St., Tukwila, WA 98118.”

23. The YRC Freight Security Investigator then told investigators that the shipper identified the contents of the shipment as cabinets, with the three crates weighing 105, 110, and 108 pounds.

24. Investigators determined that the business “KC Fine Cabinetry,” is an actual business in Washington State. However, investigators noted that the shipper listed the incorrect city and zip codes for KC Fine Cabinetry – listing Tukwila, rather than Bothell, and 98188, rather than 98011.

Controlled Delivery of Marijuana on August 14, 2017

25. On August 14, 2017, members of DEA New York, HSI New York, and New York City Police Department (NYPD) conducted a controlled delivery of this shipment to Jiang Li at 23 Cypress Avenue, Brooklyn, NY 11237. Upon delivery, Jiang Li showed his identification card and signed for the delivery. Jiang Li was also accompanied by Sunchen Yang, Dunliang Yu, and Yu Bin Qu – who were attempting to park two vans next to the delivery truck. At this time, members of the NYPD arrested all individuals and secured the area.

26. Jiang Li provided NYPD consent to open the crates, which contained a green leafy substance. Law enforcement officers on-scene indicated that the green leafy substance emitted the odor of marijuana. The green leafy substance was seized by NYPD and logged into evidence. The seized green leafy substance – later determined to be marijuana by NYPD – weighed approximately 112 pounds.

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Surveillance of QIFENG LI's Vehicle at 14468 57th Ave. S., Tukwila, WA, on August 28, 2017

27. On August 28, 2017, SA Turner and SA Chin conducted surveillance of AWP6688. At approximately 11:40 a.m., SA Chin utilized the GPS location data provided by a court-authorized tracking device and observed AWP6688 at 14468 57th Ave. S., Tukwila, WA. Upon driving by this residence, SA Chin observed AWP6688 backed into the garage of the residence.

28. Based upon a check with the Washington State Department of Revenue on April 30, 2018, SA Chin knows that 14468 57th Ave. S., Tukwila, WA, is the address listed by PONY MOVERS LLC, with the Washington State Business Licensing Service. Based upon these same records, SA Chin knows that the sole governing member of PONY MOVERS LLC in Washington State is JUNQIANG WU.

GPS Location Data Linking QIFENG LI and JUNQIANG WU (Governing Member of PONY MOVERS LLC)

29. On April 30, 2018, SA Chin reviewed the court-approved historical vehicle tracker data for AWP6688. Through analysis of GPS coordinates, SA Chin concluded that on August 16, 18, and 19, 2017, AWP6688 was parked in the vicinity of 4229 S. Bozeman St., Seattle, WA – located at GPS coordinates 47.532059, -122.279308. Furthermore, per a records check with WA DOL, 4229 S. Bozeman St., Seattle, WA, is the home address of JUNQIANG WU, the governing member of PONY MOVERS LLC.

E-mail Search Warrant Returns

30. From January through April, 2018, Microsoft (*MJI7-363*, W.D. Wa. August 31, 2017; *MJI8-112*, W.D. Wa. March 15, 2018) and Google (*MJI8-113*, W.D. Wa. March 15, 2018), provided materials responsive to e-mail account search warrants.⁴

⁴ The accounts that were searched were: kyleli77@hotmail.com (QIFENG LI's personal e-mail account); sammih789@hotmail.com (XIAMIN HUANG's personal e-mail account); junli2388@hotmail.com (account of an unidentified co-conspirator believed to reside in New York); kylesheating@gmail.com (QIFENG LI's business e-mail account); and straw e-mail

Hundreds of the e-mails returned pursuant to these warrants by Microsoft and Google appear to relate to the manufacture and distribution of marijuana, and/or provide evidence tying QIFENG LI, QIWEI LI, and XIAMIN HUANG to properties that were suspected of being used for indoor marijuana production in the greater Seattle area. The e-mail search warrant returns also resulted in the identification of PONY MOVERS LLC, a warehouse facility located at 215 Gates Rd., Unit F, Little Ferry, NJ – rented by PONY MOVERS LLC, and **SUBJECT ACCOUNTS**.

E-Mails Regarding Suspected Marijuana Shipments to New York

31. Among the items provided by Microsoft and Google were numerous e-mails that contained shipping information or labels for shipments from the greater Seattle area to New York via freight forwarders, FEDEX, or UPS. The shipments ranged in weight from 53 pounds to 450 pounds. Based upon the dates indicated on the labels, or in the substance of the e-mail, these shipments occurred from May 2016 through May 2017.

32. The majority of these shipments had return addresses that purported to be in the greater Seattle area. However, as was the case with the shipments interdicted in May 2017 (QIWEI LI) and August 2017 (QIFENG LI) the return addresses for each of the Seattle area shipments was spurious, as the company listed in the return address was not associated with the listed address, and/or the listed return address was not a true and deliverable address.

E-Mails Regarding Inquiries into Commercial Real Estate for Rent in Washington State

33. Pursuant to the warrant return, investigators also located eight e-mails – sent from the user account sammih789@hotmail.com – regarding the potential rental of commercial spaces in the greater Seattle area. These e-mails show that the QIFENG LI

accounts believed to be associated with QIFENG LI - kyleli168@gmail.com; kyleli1668@gmail.com; and kyleli16888@gmail.com.

1 DTO attempted to rent commercial space in the Western District of Washington – similar
 2 to that of the PONY MOVERS LLC warehouse located at 215 Gates Rd., Unit F, Little
 3 Ferry, NJ – as long ago as April 2017, and as recently as February 2018.

4 34. For example, in an e-mail dated January 29, 2018, “Sammi,” known by
 5 investigation to be XIAMIN HUANG – the spouse of QIFENG LI – indicates that
 6 properties sent to her by a Turbak Commerical Real Estate agent did not meet “their”
 7 requirements because the properties could not accommodate a truck that is fifty-eight feet
 8 long. In this e-mail, “Sammi” indicates that the property must have a minimum dock size
 9 of fourteen feet high, and ten feet in width.

10 **E-Mails Regarding New Jersey Based Storage Units**

11 35. The e-mail returns also show that not only was the QIFENG LI DTO
 12 searching for storage or commercial space in the Western Washington, but also, was
 13 seeking storage space on the East Coast as well.

14 36. Specifically, on October 20, 2017, the user of account
 15 sammih789@hotmail.com sent an e-mail to the user account kyleli77@hotmail.com
 16 regarding the rental of a 10’ x 10’ Public Storage unit located at 50 Milltown Rd., East
 17 Brunswick, NJ. The reservation was in the name of “Sammi Wong” with a listed move-
 18 in date of October 22, 2017.

19 37. On April 18, 2018, SA Chin submitted a DEA administrative subpoena to
 20 Public Storage for the reservation and payment details for this rental. On May 3, 2018,
 21 Public Storage indicated that a reservation was made by “Sammi Wong,” but cancelled
 22 prior to occupancy. No cancellation reason was provided.

23 38. Additionally, on December 5, 2017, the user account
 24 kyleli77@hotmail.com sent an e-mail to the user account **michaelyang89@yahoo.com**⁵
 25
 26

27 ⁵ As detailed at paragraphs 48 and 72, *infra*, MICHAEL YANG was the individual who signed
 28 the rental contract on behalf of PONY MOVERS LLC, at their NJ warehouse located at 215
 Gates Rd., Unit F, Little Ferry, NJ.

1 regarding the rental of a storage unit in New Jersey. This e-mail contained reservation
2 details of a Storage Rentals of America (SROA) unit located at 20 Mill St., Belleville,
3 NJ. A move-in date was not specified in the e-mail.

4 39. On April 18, 2018, SA Chin submitted a DEA administrative subpoena to
5 SROA requesting reservation and payment details regarding this rental. On April 23,
6 2018, SROA indicated that a reservation was made by "MICHAEL YANG," but
7 cancelled prior to occupancy. SROA notes indicated that YANG wanted to utilize a
8 forklift at the storage unit and store a forklift on site. SROA advised that forklifts were
9 not allowed at the property. As indicated in Attachment C, on December 22, 2017,
10 MICHAEL YANG and QIFENG LI exchanged e-mails wherein QIFENG LI directed
11 MICHAEL YANG to buy a used forklift.

12 **E-Mails Regarding U-Haul Reservations**

13 40. On November 20, 2017, the user account kyleli77@hotmail.com received
14 an auto-generated e-mail from U-Haul regarding contract number 96874251. The name
15 listed on the contract was "Man Lee," whom investigators believe to be Man Fung Lee,
16 identified during surveillance on August 8, 2017 – resulting in the interdiction of 112
17 pounds of marijuana. The reservation was for a U-Haul cargo trailer to be rented in
18 Burien, WA, and dropped-off in Jersey City, NJ. The e-mail address listed on the
19 reservation was QIFENG LI's personal e-mail, *i.e.*, kyleli77@hotmail.com.

20 41. Furthermore, on January 3, 2018, the user account kyleli77@hotmail.com
21 received another auto-generated e-mail from U-Haul regarding contract number
22 99252428. The name listed on this contract was "Man Li" – believed to be Man Fung
23 Lee. The reservation was for a U-Haul trailer that was to be picked-up in Burien, WA,
24 with a drop-off in Ridgefield, NJ. The address that was listed on the rental contract was

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1 46 Liberty St., Little Ferry, NJ 07643.⁶ The e-mail listed on the reservation was
2 kyleli77@hotmail.com and the phone number was 206-280-2090.⁷

3 42. Significantly, the “towing vehicle” listed on the contract was a black “2017
4 Mercedes GLE350.” Based upon surveillance and record checks with WA DOL, SA
5 Chin knows that QIFENG LI is the registered owner of a black 2017 Mercedes GLE 350.

6 43. Finally, SA Chin located an e-mail that contained a U-Haul reservation
7 dated January 3, 2018, in the name of “qifeng li.” This reservation was also for a U-Haul
8 trailer from a U-Haul located in Renton, WA. This rental appeared to be for only local
9 use in the Seattle area, as it was due back the same day of the rental. Again, the e-mail
10 listed on the reservation was kyleli77@hotmail.com and the phone number was 206-280-
11 2090. The customer’s listed address was 46 Liberty St., Little Ferry, NJ 07643, *i.e.*, the
12 same address on the cross-country “Man Li” rental also made on January 3, 2018.

13 44. Based upon SA Chin’s training and experience, and the investigation to
14 date, it is believed that the rental of U-Haul trailers in November 2017 and January 2018,
15 were for the cross-country shipment of marijuana by the QIFENG LI DTO. SA Chin
16 believes that due to the seizures in May and August 2017, the QIFENG LI DTO changed
17 their method of shipment of marijuana, moving from a system where they used UPS,
18 FedEx, and freight forwarders, to a system controlled by them. Given that the DTO
19 began to ship marijuana in bulk at the end of 2017, SA Chin believes that the warehouse
20 of PONY MOVERS LLC located at 215 Gates Rd., Unit F, Little Ferry, NJ, was rented
21 in January 2018 so that – among other reasons – the QIFENG LI DTO could store these
22
23

24
25 ⁶ Based upon an open source internet search, SA Chin knows that this address is associated with
26 A&D Towing and Recovery, located 0.9 miles from the warehouse of PONY MOVERS LLC
27 located at 215 Gates Rd., Unit F, Little Ferry, NJ. Neither Man Fung Lee nor QIFENG LI are
28 known to have any affiliation with A&D Towing and Recovery.

⁷ Based upon records obtained via administrative subpoena, SA Chin knows that the subscriber
for this phone number is QIFENG LI.

1 bulk shipments of marijuana once they were transported from Washington State to the
2 East Coast.

3 **E-Mails linking PONY MOVERS LLC, SUBJECT ACCOUNTS, and the QIFENG**
4 **LI DTO**

5 45. Finally, nineteen e-mails provided in the Microsoft search warrant return
6 for the user account kyleli77@hotmail.com, showed direct affiliation between members
7 of the QIFENG LI DTO, PONY MOVERS LLC, and **SUBJECT ACCOUNTS**. All
8 nineteen of these e-mails are detailed in Attachment C to this warrant, attached hereto,
9 and incorporated herein. Six of these e-mails are further described below.

10 46. In an e-mail dated September 25, 2017, the user account
11 kyleli77@hotmail.com sent an image of a handwritten note to the user accounts
12 **michaelyang89@yahoo.com** and alexv@glostone.com. The note listed the company
13 details for PONY MOVERS LLC, including Unified Business Identifier (UBI)
14 #604129861, "Agent Name: JUNQIANG WU," and "New Address: 14468 57th Ave. S.,
15 Tukwila, WA 98168."

16 47. In an e-mail dated September 26, 2017, containing a Glostone Trucking
17 Solutions customer information sheet, JUNQIANG WU is listed as the contact for PONY
18 MOVERS LLC, with the company's physical address listed as 14468 57th Ave. S.,
19 Tukwila, WA. WU's home address was listed as 4229 S. Bozeman St., Seattle, WA.

20 48. In an e-mail dated December 12, 2017, William Gates of Gates Realty
21 Corp., sent MICHAEL YANG an unexecuted lease for the PONY MOVERS LLC
22 warehouse located at 215 Gates Rd., Unit F, Little Ferry, NJ. The landlord was listed as
23 Gates Realty Corp., at 211-A Gates Road, Little Ferry, New Jersey 07643, with PONY
24 MOVERS LLC, at 14468 57th Avenue S, Tukwila, Washington 98168, as tenant. The
25 contract indicates that the term of the contract is one-year, commencing on January 1,
26 2018, with a monthly rental payment of \$2,470. The personal guarantor listed on the
27 contract is MICHAEL YANG.

49. In an e-mail dated December 1, 2017, the user account kyleli77@hotmail.com received notice from **ponymoversllc@gmail.com** that PONY MOVERS LLC paid \$11.29 for insurance.

50. In another e-mail dated December 1, 2017, the user account kyleli77@hotmail.com received a receipt from Joe Dodd Incorporated sent to **michaelyang89@yahoo.com** for six wood international shipping crates at the cost of \$450.00. This receipt was also sent to **ponymoversllc@gmail.com** by kyleli77@hotmail.com.

51. Finally, in e-mails dated January 17, 2018, and February 20, 2018, the user account **michaelyang89@yahoo.com** sent the user account kyleli77@hotmail.com monthly statements for 215 Gates Rd., Unit F, Little Ferry, NJ, for February and March 2018. The balance due for each of these statements was \$3,250. The body of each of these e-mails from **michaelyang89@yahoo.com** was blank. The response to these e-mails from the user account kyleli77@hotmail.com was “Thx” (January 17, 2018) and “thx” (February 20, 2018).

Occupancy of PONY MOVERS LLC, at 215 Gates Rd., Unit F, Little Ferry, NJ, confirmed on May 4, 2018.

52. On May 4, 2018, at approximately 2:05 p.m., SA Chin and SA Julian Hur initiated surveillance at 215 Gates Rd., Unit F, Little Ferry, NJ. Upon arrival, investigators did not see any activity at 215 Gates Rd., Unit F, Little Ferry, NJ, nor did they observe any vehicles that were believed to be associated with the QIFENG LI DTO. On the monument sign at the entrance of the commercial property where Unit F is located, investigators observed “215 Gates Rd. . . . F PONY MOVERS LLC.” Surveillance was terminated after approximately fifteen minutes.

Search Warrants Executed on May 16, 2018, at QIFENG LI DTO Properties

53. On May 16 and 17, 2018, investigators from various law enforcement agencies including DEA and HSI executed federal search warrants at sixteen Washington residences related to the QIFENG LI DTO. *MJI8-218 (1) – (16)*, W.D. Wa. May 11,

2018. The addresses of these residences and the results of the searches conducted – to include the seizure of more than 3,500 marijuana plants – are detailed below:

Active Marijuana Grow	Affiant Notes
8310 37th Ave. S., Seattle, WA	434 marijuana plants seized
3706 S. Willow St., Seattle, WA	396 marijuana plants seized
2621 NE 25th St., Renton, WA	256 marijuana plants seized
4623 E. F St., Tacoma, WA	419 marijuana plants seized
4414 S. Sheridan Ave., Tacoma, WA	537 marijuana plants seized
517 S. 52nd St., Tacoma, WA	358 marijuana plants seized
4229 S. Bozeman St., Seattle, WA	59 marijuana plants seized. JUNQIANG WU present at the time of search execution.
21021 121st Pl. SE, Kent, WA	400 marijuana plants seized
12811 35th Ave. S., Tukwila, WA	724 marijuana plants seized

Inactive Marijuana Grow	Affiant Notes
234 SW 137th St., Burien, WA	Inactive marijuana grow consisting of some or all of the following items: large pumps, marijuana growing trays, rolling racks, drying racks, electrical ballasts, grow lights, fertilizers, air filters, and modified electrical wiring.
6916 S. 124th St., Seattle, WA / 12065 70th Ave. S., Seattle, WA	
4223 S. 261st St., Kent, WA	
1017 S. 242nd St., Des Moines, WA	
5151 S. Cushman Ave., Tacoma, WA	

Marijuana Drying Room	Affiant Notes
15735 143rd Ave. SE, Renton, WA	Marijuana processing room built in the attached garage of the residence. Investigators located two vacuum sealers, vacuum seal bags, marijuana drying racks, a ventilation system that incorporated a large charcoal filter, and a small amount of a leafy substance that field-tested positive for marijuana.

Decommissioned Marijuana Grow	Affiant Notes
10041 51st Ave. S., Seattle, WA	Interior of the residence showed signs of previously operating as a marijuana grow. Investigators located large air filters, reflective

	mylar sheeting, foam insulation, and modified electrical panel/wires.
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Search Warrant at PONY MOVERS LLC New Jersey Warehouse Facility

54. On May 16, 2018, agents from HSI Newark executed a federal search warrant at the PONY MOVERS LLC New Jersey Warehouse located at 215 Gates Rd., Unit F, Little Ferry, NJ. *MJ18-8036*, D.N.J. May 15, 2018. At the time the search was executed, no one was present. Investigators did not locate marijuana during their search.

55. However, investigators did locate several empty shipping crates – many containing dryer sheets. Based upon his training and experience, SA Chin knows that dryer sheets are used by drug traffickers to mask or obscure the smell emanating from shipments containing narcotics. Furthermore, the labels on the exterior of the wooden crates listed the contents of the shipment as apple juice. These same shipping labels indicated that the origin of the shipment was Washington State.

Surveillance Footage of PONY MOVERS LLC New Jersey Warehouse Facility

56. During the week of July 3, 2018, HSI SA Jason Posniak was provided video surveillance footage from the occupant of 215 Gates Rd., Unit E, Little Ferry, NJ, *i.e.*, the unit adjacent to the PONY MOVERS LLC New Jersey warehouse.

57. During the week of July 17, 2018, SA Chin analyzed the video footage provided to SA Posniak. SA Chin noted that on May 3, 2018, May 11, 2018, and May 12, 2018, there were instances of unidentified Asian adult males frequenting Unit F before and after a white tractor-trailer bearing “PONY MOVERS” markings arrived at the PONY MOVERS LLC New Jersey warehouse facility.

58. More specifically, on May 3, 2018, at approximately 7:34 a.m. (EDT), a blue Honda Odyssey driven by an unidentified Asian adult male parked directly in front of 215 Gates Rd., Unit E, Little Ferry, NJ. At approximately 7:35 a.m., a black Toyota Sienna parked directly alongside the blue Honda Odyssey and an unidentified Asian adult male proceeded to open the door to Unit F. At approximately 7:39 a.m., the driver of the

1 blue Honda Odyssey entered Unit F on foot. Shortly after, the black Toyota Sienna drove
2 out of camera view.

3 59. At approximately 8:58 a.m., a white tractor-trailer bearing “Penske” and
4 “PONY MOVERS” markings arrived on site. The driver of this tractor-trailer was an
5 unidentified Asian adult male. At approximately 9:02 a.m., the tractor-trailer backed-up
6 to the entrance of Unit F. The tractor-trailer remained backed-up to the entrance of the
7 PONY MOVERS LLC spaces until approximately 9:28 a.m. Due to the angle of the
8 camera, it cannot be determined whether the tractor-trailer was being loaded or unloaded
9 during this time.

10 60. At approximately 9:43 a.m., the blue Honda Odyssey backed into Unit F’s
11 garage out of view. At approximately 10:39 a.m., the previously seen black Toyota
12 Sienna and blue Honda Odyssey drove out of the garage. At approximately 10:43 a.m.,
13 both vehicles departed Unit F.

14 61. At approximately 1:27 p.m., the previously seen black and blue Honda
15 Odysseys arrived back at Unit F and drove into the garage out of public view. At
16 approximately 3:02 p.m., the vehicles departed Unit F.

17 62. On May 11, 2018, at approximately 10:25 a.m., SA Chin observed what
18 appeared to be the same white “PONY MOVERS” tractor-trailer return to the parking lot
19 of 215 Gates Rd., Little Ferry, NJ. Upon arrival, the tractor-trailer backed-up to the
20 garage of Unit F. At approximately 10:30 a.m., a yellow fork lift can be seen moving
21 back and forth between Unit F and the truck, unloading unknown contents. At
22 approximately 10:49 a.m., two unidentified Asian adults appear in view of the video, one
23 of whom is driving the tractor-trailer out of the parking lot. At approximately 1:00 p.m.,
24 a black Toyota Sienna backed out of Unit F’s garage followed by a blue Honda Odyssey.
25 The vehicles then departed the parking lot.

26 63. On May 12, 2018 at approximately 9:15 a.m., SA Chin observed a black
27 Toyota Sienna enter the garage of Unit F. At approximately 9:25 a.m., the black Toyota
28 Sienna then drove out of Unit F’s garage and departed the parking lot.

64. Based upon his training and experience and the investigation to date, SA Chin believes that on the above dates the PONY MOVERS tractor-trailer was delivering marijuana grown in Washington State to the PONY MOVERS LLC warehouse facility in New Jersey. SA Chin further believes that after this delivery, the vehicles observed at the PONY MOVERS LLC facility then loaded the marijuana into their respective vehicles inside the garage and out of public view. It is suspected that these vehicles then departed the facility with loads of marijuana for further distribution throughout the greater New York City area.

PONY MOVERS LLC U.S. Department of Transportation Inactive Freight Carrier License

65. On August 1, 2018, SA Chin contacted the El Paso Intelligence Center (EPIC) to determine vehicles associated with PONY MOVERS LLC, United States Department of Transportation (DOT) #3053197.

66. On the same date, EPIC indicated PONY MOVERS LLC was an inactive freight courier and that they completed "Out of Business" paperwork on June 13, 2018. PONY MOVERS' registered address correlating with their DOT number was 14468 51st Ave S, Tukwila, WA 98168. A mailing address was listed as P.O. Box 1650, Clackamas, OR. Phone numbers were listed as 206-512-4730 and 206-915-7261. Their Tax ID number was 822910017. An e-mail address was listed as **ponymoversllc@gmail.com**. JUNQIANG WU was listed as the member filing paperwork on the behalf of PONY MOVERS LLC.

67. EPIC also indicated that from March 2018 through May 2018 there were six vehicle inspections involving tractor-trailers affiliated with PONY MOVERS LLC. These inspections are further detailed below.

Inspection Date	Vehicle Inspected	VIN	Vehicle Registration	Driver	Inspection Location
3/9/18	OR-YALT125	1XKWDB9X06J113383	Oversize Express Inc., 17662 SW Galewood Dr, Sherwood, OR	Rodney D. BAUMER	South Dakota

				(DOB: XX/XX/1969)	
3/9/18	CA- 4LP2473	1UYVS2538 CP241106	Brothers Transportation Inc, 14934 Ramona Blvd, Baldwin Park, CA	Rodney D. BAUMER (DOB: XX/XX/1969)	South Dakota
5/5/18	IN- 2747231	3AKJHHDR XKSKE1448	Penske Truck Leasing Co, 2675 Morgantown Rd, Reading, PA	Mingden ZHANG (DOB: XX/XX/1969)	Billings, MT
5/5/18	CA- 4LP2473	1UYVS2538 CP241106	Brothers Transportation Inc, 14934 Ramona Blvd, Baldwin Park, CA	Mingden ZHANG (DOB: XX/XX/1969)	Billings, MT
5/5/18	IN- 2747231	3AKJHHDR XKSKE1448	Penske Truck Leasing Co, 2675 Morgantown Rd, Reading, PA	Yingwen HUANG (DOB: XX/XX/1969)	Liberty Lake, WA
5/5/18	CA- 4LP2473	1UYVS2538 CP241106	Brothers Transportation Inc, 14934 Ramona Blvd, Baldwin Park, CA	Yingwen HUANG (DOB: XX/XX/1969)	Liberty Lake, WA

68. Based on the timing of the “Out of Business” paperwork filed on June 13, 2018, SA Chin believes that following the execution of the May 16, 2018, search warrants, JUNQIANG WU closed PONY MOVERS LLC as the sole purpose for PONY MOVERS LLC was to transport marijuana produced by the QIFENG LI DTO in Washington State for further distribution on the East Coast.

PONY MOVERS LLC Wells Fargo Bank Records

69. On August 29, 2018, SA Chin analyzed checking and savings account records provided by Wells Fargo Bank for PONY MOVERS LLC. These records show that JUNQIANG WU opened Wells Fargo checking and savings accounts in the name of PONY MOVERS LLC on March 7, 2018. The mailing address for the PONY MOVERS account was listed as 680 Edmonds Ave. NE, Renton, WA.⁸ On the account opening

⁸ As noted in paragraphs 17-26, *supra*, this residence was associated with the seizure of 112 pounds of marijuana that had been shipped from Washington State to New York City in August 2017.

records, JUNQIANG WU indicated that PONY MOVERS LLC was engaged in the business of transportation and warehousing.

70. From the time of account opening through June 30, 2018, eighteen checks – all signed by JUNQIANG WU – were drawn against the PONY MOVERS LLC Wells Fargo checking account. Based upon SA Chin's training and experience and the investigation to date, it is suspected that each of the these checks related to expenses incurred by the QIFENG LI DTO in furtherance of the overall conspiracy to produce marijuana in Washington State, transport this marijuana across country via tractor-trailer, and ultimately distribute this marijuana on the East Coast. Each of these checks is further detailed below.

Check Date	Check Amount	Check Recipient	Memo	Signature
3/23/2018	\$1,850.00	Rodney Baumer	"Trip 7 Rd trip WA-NJ"	JUNQIANG WU
3/23/2018	\$2,000.00	Rodney Baumer	"Trip 7 Rnd trip"	JUNQIANG WU
3/31/2018	\$3,250.00	Gates Realty Corp.	"Rent for 04/18"	JUNQIANG WU
4/3/2018	\$2,520.00	Oversize Express Inc.	"Truck Load Payment; Paid Mark Turner's Load \$2800 - 12% = \$2520.00"	JUNQIANG WU
4/14/2018	\$600.00	Mark Turner	"Settlement"	JUNQIANG WU
4/16/2018	\$9,000.00	Oversize Express Inc.	"Truck Leasing Deposit"	JUNQIANG WU
4/18/2018	\$11,000.00	Oversize Express Inc.	"Penske Trucking Leasing"	JUNQIANG WU
4/21/2018	\$2,500.00	Rodney Baumer	"Trip #8, Settlement pay"	JUNQIANG WU
4/25/2018	\$3,000.00	Noble Pacific Enterprises	"May Rent + \$1,000 Deposit"	JUNQIANG WU
4/28/2018	\$3,250.00	Gates Realty Corp.	"Rent for 05/2018"	JUNQIANG WU
5/4/2018	\$1,100.00	Rodney Baumer	"Paycheck"	JUNQIANG WU
5/4/2018	\$1,475.00	Oversize Express Inc.	"Pay to over on MT"	JUNQIANG WU

1			Zhang Ming		JUNQIANG WU
2	5/4/2018	\$1,950.00	Deng	"Trip One Paycheck"	
3	5/4/2018	\$1,950.00	Yingwen Huang	"Trip One Payment"	JUNQIANG WU
4	5/7/2018	\$1,000.00	MICHAEL		JUNQIANG WU
5	5/8/2018	\$308.50	YANG	"Install tool box #1"	
6			Rodney Baumer	"Fuel for Day cab"	JUNQIANG WU
7	5/11/2018	\$1,158.00	Mark Turner	"Settlement of \$15,200; 138112695152"	JUNQIANG WU
8	5/11/2018	\$1,100.00	Rodney Baumer	"(?) Weekly Part (?)"	JUNQIANG WU

71. In addition to the above information, Wells Fargo also provided video surveillance footage showing deposits made into the PONY MOVERS LLC checking account during the months of April and May 2018. Significantly, MICHAEL YANG is associated with two transactions involving the PONY MOVERS Wells Fargo checking account in May 2018. First, on May 8, 2018, MICHAEL YANG was identified making a deposit of two \$1,000 Western Union money orders made out to PONY MOVERS LLC at a Wells Fargo branch located at 1610 NE 122nd Ave., Portland, OR. Second, on May 22, 2018, MICHAEL YANG can be observed on surveillance video requesting an account statement via ATM at the Wells Fargo Branch located on Hayden Island in Portland, OR.

Gates Realty Corp. Records Relating to PONY MOVERS LLC Rental of 215 Gates Rd., Unit F, Little Ferry, NJ

72. On August 29, 2018, SA Chin analyzed records provided by Gates Realty Corp. – the landlord for 215 Gates Rd., Unit F, Little Ferry, NJ. These records show that MICHAEL YANG engaged Gates Realty Corp. to set up the rental of Unit F. These records also show that MICHAEL YANG provided a “personal guaranty” for the lease.

73. A copy of YANG’s Oregon driver’s license was also contained in the records provided by Gates Realty Corp. I have reviewed both the copy of YANG’s driver’s license contained in the Gates Realty Corp. records, as well as the YANG’s official driver’s license photo obtained from Oregon Department of Licensing. I recognize the person depicted in both records to be the person who was observed

1 conducting transactions related to the PONY MOVERS LLC Wells Fargo checking
2 account detailed in paragraph 71, *supra*.

3 **BACKGROUND REGARDING YAHOO! INC. AND GOOGLE LLC SERVICES**

4 74. In my training and experience, I have learned that Yahoo! Inc. and Google
5 LLC each provide a variety of on-line services, including e-mail access, to the public.
6 Yahoo! Inc. allows subscribers to obtain e-mail accounts at the domain name
7 “yahoo.com,” like the e-mail account listed in Attachment A1. Google LLC allows
8 subscribers to obtain e-mail accounts at the domain name “gmail.com,” like the e-mail
9 account listed in Attachment A2.

10 75. Subscribers obtain a “yahoo.com” account by registering with Yahoo! Inc.
11 Subscribers obtain a “gmail.com” account by registering with Google LLC. When doing
12 so, e-mail providers like Yahoo! Inc. and Google LLC ask subscribers to provide basic
13 personal information. This information can include the subscriber’s full name, physical
14 address, telephone numbers and other identifiers, alternative e-mail addresses, and, for
15 paying subscribers, means and source of payment (including credit or bank account
16 number). Therefore, the computers of Yahoo! Inc. for “yahoo.com” accounts, and
17 computers of Google LLC for “gmail.com” accounts are likely to contain stored
18 electronic communications (including retrieved and un-retrieved e-mail) and information
19 concerning subscribers and their use of Yahoo! Inc. (yahoo.com) or Google LLC
20 (gmail.com) services, such as account access information, e-mail transaction information,
21 and account application information. In my training and experience, such information
22 may constitute evidence of the crimes under investigation because the information can be
23 used to identify the account’s user or users.

24 76. A subscriber to Yahoo! Inc. services can also store with the provider, files,
25 including address books, contact lists, calendar data, photographs and other files, on
26 servers maintained and/or owned by Yahoo! Inc. For example, Yahoo! Inc. offers users a
27 calendar service that users may utilize to organize their schedule and share events with
28 others. In my training and experience, evidence of who was using an e-mail account may

1 be found in address books, contact or buddy lists, e-mail in the account, and attachments
2 to e-mails, including pictures and files.

3 77. A subscriber to a Google Gmail account can also store files, including
4 address books, contact lists, calendar data, photographs and other files, on servers
5 maintained and/or owned by Google. For example, Google offers users a calendar
6 service that users may utilize to organize their schedule and share events with others.
7 Google also offers users' a service called Google Drive that may be used to store data and
8 documents. The Google Drive service may be used to store documents including
9 spreadsheets, written documents (such as Word or Word Perfect) and other documents
10 that could be used to manage a website. Google Drive allows users to share their
11 documents with others or the public depending on the settings selected by the account
12 holder. Google also provides its users with access to the photo storage service "Picasa."
13 Picasa can be used to create photo albums, store photographs, and share photographs with
14 others. Another Google service called "You Tube" allows users to view, store and share
15 videos. Google also provides a service called "Google Analytics." Google Analytics is a
16 Google service that monitors website traffic and provides subscribers with data relating to
17 how much traffic is visiting the subscriber's website, which sections of the subscriber's
18 website users are visiting, how long users are staying on particular sections of the site,
19 and the geographical source of users visiting the website, among other things.

20 78. In my training and experience, e-mail providers generally ask their
21 subscribers to provide certain personal identifying information when registering for an e-
22 mail account. Such information can include the subscriber's full name, physical address,
23 telephone numbers and other identifiers, alternative e-mail addresses, and, for paying
24 subscribers, means and source of payment (including any credit or bank account number).
25 In my training and experience, such information may constitute evidence of the crimes
26 under investigation because the information can be used to identify the account's user or
27 users. Based on my training and my experience, I know that, even if subscribers insert
28

1 false information to conceal their identity, this information often provides clues to their
2 identity, location, or illicit activities.

3 79. E-mail providers typically retain certain transactional information about the
4 creation and use of each account on their systems. This information can include the date
5 on which the account was created, the length of service, records of log-in (*i.e.*, session)
6 times and durations, the types of service utilized, the status of the account (including
7 whether the account is inactive or closed), the methods used to connect to the account
8 (such as logging into the account via the provider's website), and other log files that
9 reflect usage of the account. In addition, e-mail providers often have records of the IP
10 address used to register the account and the IP addresses associated with particular logins
11 to the account. Because every device that connects to the Internet must use an IP address,
12 IP address information can help to identify which computers or other devices were used
13 to access the e-mail account, which can help establish the individual or individuals who
14 had dominion and control over the account.

15 80. In some cases, e-mail account users will communicate directly with an e-
16 mail service provider about issues relating to the account, such as technical problems,
17 billing inquiries, or complaints from other users. E-mail providers typically retain
18 records about such communications, including records of contacts between the user and
19 the provider's support services, as well records of any actions taken by the provider or
20 user as a result of the communications. In my training and experience, such information
21 may constitute evidence of the crimes under investigation because the information can be
22 used to identify the account's user or users.

23 81. As explained herein, information stored in connection with an e-mail
24 account may provide crucial evidence of the "who, what, why, when, where, and how" of
25 the criminal conduct under investigation, thus enabling the United States to establish and
26 prove each element or alternatively, to exclude the innocent from further suspicion. In
27 my training and experience, the information stored in connection with an e-mail account
28 can indicate who has used or controlled the account. This "user attribution" evidence is

analogous to the search for “indicia of occupancy” while executing a search warrant at a residence. For example, e-mail communications, contacts lists, and images sent (and the data associated with the foregoing, such as date and time) may indicate who used or controlled the account at a relevant time. Further, information maintained by the e-mail provider can show how and when the account was accessed or used. For example, as described below, e-mail providers typically log the IP addresses from which users access the e-mail account, along with the time and date of that access. By determining the physical location associated with the logged IP addresses, investigators can understand the chronological and geographic context of the e-mail account access and use relating to the crime under investigation. This geographic and timeline information may tend to either inculcate or exculpate the account owner. Additionally, information stored at the user’s account may further indicate the geographic location of the account user at a particular time (e.g., location information integrated into an image or video sent via e-mail). Last, stored electronic data may provide relevant insight into the e-mail account owner’s state of mind as it relates to the offense under investigation. For example, information in the e-mail account may indicate the owner’s motive and intent to commit a crime (e.g., communications relating to the crime), or consciousness of guilt (e.g., deleting communications in an effort to conceal them from law enforcement).

PRIOR EFFORTS TO OBTAIN EVIDENCE

82. I understand that the contents of the **SUBJECT ACCOUNTS** can only be obtained in the Ninth Circuit by means of a search warrant issued under the authority of Title 18 United States Code, Sections 2703(a), 2703(b)(1)(A), 2703(c)(1)(A), and Federal Rule of Criminal Procedure 41(e)(2)(B). To the best of my knowledge and belief, there have been no prior attempts to secure a search warrant to search and seize these records.

PROTOCOL FOR SORTING SEIZABLE ELECTRONICALLY STORED INFORMATION

83. In order to ensure that agents are limited in their search only to the **SUBJECT ACCOUNTS** (and any attachments, stored instant messages, stored voice

1 | messages, documents, and photographs associated therewith), to protect the privacy
2 | interests of other third parties who have accounts at Yahoo! Inc. (yahoo.com) and Google
3 | LLC (gmail.com), and to minimize disruptions to normal business operations of Yahoo!
4 | Inc. and Google LLC this application seeks authorization to permit agents and employees
5 | of Yahoo! Inc. and Google LLC to assist in the execution of the warrant, pursuant to Title
6 | 18 United States Code, Section 2703(g) as follows:

7 | a. The search warrant(s) will be presented to Yahoo! Inc. (yahoo.com)
8 | or Google LLC (gmail.com), with direction that each provider identify and isolate the e-
9 | mail account(s) and associated records described in Section I of Attachment B1
10 | (yahoo.com) or B2 (gmail.com);

11 | b. Each provider will be directed to create an exact duplicate in
12 | electronic form of the e-mail account(s) and records specified in Section I of Attachment
13 | B1 (Yahoo! Inc.) and B2 (Google LLC), including an exact duplicate of the content of all
14 | e-mail messages stored in the specified e-mail account(s);

15 | c. Each provider shall then provide an exact digital copy of the
16 | contents of the **SUBJECT ACCOUNTS**, as well as all other records associated with the
17 | account(s), to me or to any other agent of DEA or HSI. Once the digital copy of a user
18 | account has been received from Yahoo! Inc. (yahoo.com) or Google LLC (gmail.com),
19 | each copy will, in turn, be forensically imaged and only that image will be reviewed and
20 | analyzed to identify communications and other data subject to seizure pursuant to Section
21 | II of Attachment B1 (yahoo.com) or B2 (gmail.com). The original digital copies will be
22 | sealed and maintained to establish authenticity, if necessary;

23 | d. I and/or other agents of DEA or HSI, will thereafter review the
24 | forensic image, and identify from among that content, those items that come within the
25 | items identified in Section II of Attachment B1 (yahoo.com) and B2 (gmail.com), for
26 | seizure. I and/or other agents of DEA or HSI will then copy those items identified for
27 | seizure to separate media for future use in the investigation and prosecution. The
28 | forensic copy of the complete content of the e-mail accounts will also then be sealed and

1 retained by DEA or HSI, and will not be unsealed absent Court authorization, except for
2 the purpose of duplication of the entire image in order to provide it, as discovery, to a
3 charged defendant;

4 e. Analyzing the data contained in the forensic image may require
5 special technical skills, equipment, and software. It could also be very time consuming.
6 Searching by keywords, for example, can yield thousands of “hits,” each of which must
7 then be reviewed in context by the examiner to determine whether the data is within the
8 scope of the warrant. Merely finding a relevant “hit” does not end the review process.
9 Keywords used originally need to be modified continuously, based on interim results.
10 Certain file formats, moreover, do not lend themselves to keyword searches, as keywords
11 search text, and many common electronic mail, database, and spreadsheet applications,
12 (which may be attached to e-mail) do not store data as searchable text. The data is saved,
13 instead, in proprietary non-text format. And, as the volume of storage allotted by service
14 providers increases, the time it takes to properly analyze recovered data increases as well.
15 Consistent with the foregoing, searching the recovered data for the information subject to
16 seizure pursuant to this warrant may require a range of data analysis techniques and may
17 take weeks or even months;

18 f. Based upon my experience and training, and the experience and
19 training of other agents with whom I have communicated, it is necessary to seize all
20 electronic mails, chat logs and documents, that identify any users of the **SUBJECT**
21 **ACCOUNTS** and any electronic mails sent or received in temporal proximity to
22 incriminating e-mails that provide context to the incriminating communications; and,

23 g. All forensic analysis of the image data will employ only those search
24 protocols and methodologies reasonably designed to identify and seize the items
25 identified in Section II of Attachments B1 and B2 to the warrant.

26 **GENUINE RISKS OF DESTRUCTION OF EVIDENCE**

27 84. Based upon my experience and training, it is not uncommon for technically
28 sophisticated criminals to use encryption or programs to destroy data that can be

1 triggered remotely, or by a pre-programed event or keystroke, or other sophisticated
2 techniques to hide data. In this case, the data this application seeks is stored on an
3 enterprise storage system, also known as a server, belonging to Yahoo! Inc or Google
4 LLC. If that data is accessed and deleted by the user, by either deleting the e-mails or any
5 associated contact lists, the content would not be retrievable. Unlike traditional computer
6 forensics where a hard drive can be searched and deleted documents recovered,
7 information stored in an enterprise storage system is irretrievable once it has been deleted.
8 Further, since this information is accessible from anywhere that the suspect can obtain an
9 Internet connection to log on to his account, any user can delete this information in a
10 matter of minutes.

11 **REQUEST FOR NON-DISCLOSURE AND SEALING**

12 85. The government requests, pursuant to the preclusion of notice provisions of
13 Title 18, United States Code, Section 2705(b), that Yahoo! Inc. (yahoo.com) and Google
14 LLC (gmail.com), be ordered not to notify any person (including the subscriber or
15 customer to which the materials relate) of the existence of this warrant for a period of one
16 year from the date of this warrant, unless this period is further extended by the Court. The
17 government submits that such an order is justified because notification of the existence of
18 this Order would seriously jeopardize the on-going investigation. Such a disclosure would
19 give the subscriber an opportunity to destroy evidence, change patterns of behavior, notify
20 confederates, or flee or continue his flight from prosecution. Furthermore, based upon the
21 investigation to date, it is suspected that evidence in this investigation may be stored
22 electronically. If alerted to the existence of the warrant, the subjects under investigation
23 could destroy that evidence, including information saved to their personal computers.

24 86. It is further respectfully requested that this Court issue an order sealing, until
25 further order of the Court, all papers submitted in support of this application, including the
26 application and search warrant. I believe that sealing this document is necessary because
27 notification of the existence of these warrants would, likewise,
28

1 seriously jeopardize the on-going investigation. The availability of these documents
2 would give the subscriber an opportunity to destroy evidence, change patterns of
3 behavior, notify confederates, or flee or continue his flight from prosecution. Premature
4 disclosure of the contents of this affidavit and related document may have a significant
5 and negative impact on the continuing investigation and may severely jeopardize its
6 effectiveness.

7 **CONCLUSION**

8 87. Based on the foregoing, I respectfully submit that there is probable cause to
9 believe that the contents of the wire and electronic communications pertaining to and
10 found in the **SUBJECT ACCOUNTS** are evidence, fruits, and instrumentalities of
11 criminal violations of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (B)(i),
12 laundering of monetary instruments; and Title 21, United States Code, Sections 841(a)(1)
13 and 846, distribution and conspiracy to distribute controlled substances. This Court has
14 jurisdiction to issue the requested warrant pursuant to Title 18, United States Code,
15 Section 2703, because it is "a court of competent jurisdiction as defined by Title 18,
16 United States Code, section 2711(3)(A)(i) (defining a "court of competent jurisdiction" to
17 include "a district court of the United States. . . that has jurisdiction over the offense
18 being investigated."

19
20 

21 ERIC K. CHIN, Special Agent
22 Drug Enforcement Administration

23 The above-named agent provided a sworn statement attesting to the truth of the
24 contents of the foregoing affidavit on this 6th day of September, 2018.

25
26 

27 BRIAN A. TSUCHIDA
28 Chief United States Magistrate Judge

ATTACHMENT A1

Account to be searched:

The electronically stored information and communications contained in, related to, and associated with, including all preserved data associated with Yahoo! Inc. account: **michaelyang89@yahoo.com**; for the period of January 1, 2017, to the present, as well as all other subscriber and log records associated with the account, which are located at premises owned, maintained, controlled or operated by Yahoo! Inc., a provider of electronic communication and remote computing services, headquartered at 701 First Ave., Sunnyvale, California 94089.

ATTACHMENT B1

Section I - Information to be disclosed by Yahoo! Inc. for search:

1. To the extent that the information described in Attachment A1 is within the possession, custody, or control of the Provider, regardless of whether such information is stored, held or maintained inside or outside of the United States, and including any emails, records, files, logs, or information that has been deleted but is still available to the Provider, or has been preserved pursuant to a request made under 18 U.S.C. § 2703(f), the Provider is required to disclose the following information to the government for each account or identifier listed in Attachment A1:

a. The contents of all e-mails associated with the account, including stored or preserved copies of e-mails sent to and from the account, draft e-mails, the source and destination addresses associated with each e-mail, the date and time at which each e-mail was sent, and the size and length of each e-mail;

b. All records or other information regarding the identification of the account, to include full name, physical address, telephone numbers and other identifiers, records of session times and durations, the date on which the account was created, the length of service, the IP address used to register the account, log-in IP addresses associated with session times and dates, account status, alternative e-mail addresses provided during registration, methods of connecting, log files, and means and source of payment;

c. The types of service utilized;

d. All records or other information stored at any time by an individual using the account, including address books, contact and buddy lists, calendar data, pictures, and files;

e. All records pertaining to communications between the provider and any person regarding the account, including contacts with support services and records of actions taken.

f. For all information required to be disclosed pursuant to this warrant, the physical location or locations where the information is stored.

1 The Provider is hereby ordered to disclose the above information to the government
2 within fourteen days of the issuance of this warrant.

3 **Section II - Information to be seized:**

4 2. All information described above in Section I that constitutes fruits, contraband,
5 evidence, and instrumentalities of violations of Title 18, United States Code, Sections
6 1956(a)(1)(A)(i) and (B)(i), laundering of monetary instruments; and Title 21, United
7 States Code, Sections 841(a)(1) and 846, distribution and conspiracy to distribute
8 controlled substances, those violations involving QIFENG LI, QIWEI LI, XIAMIN
9 HUANG, JUNQIANG WU, and MICHAEL YANG, for each account or identifier listed
10 on Attachment A1, information pertaining to the following matters:

11 a. All content including messages, documents and profile information,
12 attachments, or other data that otherwise constitutes evidence, fruits, and
13 instrumentalities of violations of Title 18, United States Code, Sections 1956(a)(1)(A)(i)
14 and (B)(i); and Title 21, United States Code, Sections 841(a)(1) and 846. Specifically,
15 information pertaining to: the day-to-day operations and logistics of the cultivation and
16 movement of marijuana, including the sale of marijuana, purchasers of marijuana,
17 licenses and/or application for licenses pertaining to marijuana; the shipping, tracking,
18 and delivery of packages containing marijuana; the logistics of managing bulk cash and
19 illicit proceeds, including the laundering, structuring, placement, layering, integration, of
20 illicit proceeds; the procurement of residential properties; the utilities associated with the
21 residential properties; the persons associated with the residential properties and utilities;
22 and communications between QIFENG LI, QIWEI LI, XIAMIN HUANG, JUNQIANG
23 WU, and MICHAEL YANG, and co-conspirators including those who may be involved
24 in third party money laundering to include any preparatory steps taken in furtherance of
25 the overall scheme;

26 b. All content including messages, documents, and profile information,
27 attachments, or other data that serves to identify any persons who use or access the
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1 account specified, or who exercise in any way any dominion or control over the specified
2 account;

3 c. Any address lists, contact lists or other lists associated with the specified
4 account that may identify co-conspirators;

5 d. All subscriber records associated with the specified account, including
6 name, address, local and long distance telephone connection records, or records of
7 session times and durations, length of service (including start date) and types of service
8 utilized, telephone or instrument number or other subscriber number or identity,
9 including any temporarily assigned network address, and means and source of payment
10 for such service) including any credit card or bank account number;

11 e. Any and all other log records, including IP address captures, associated
12 with the specified account; and,

13 f, Any records of communications between Yahoo! Inc., and any person
14 about issues relating to the account, such as technical problems, billing inquiries, or
15 complaints from other users about the specified account. This is to include records of
16 contacts between the subscriber and the provider's support services, as well as records of
17 any actions taken by the provider or subscriber as a result of the communication.

ATTACHMENT A2

Accounts to be searched:

The electronically stored information and communications contained in, related to, and associated with, including all preserved data associated with Gmail accounts: **ponymoversllc@gmail.com**; for the period of January 1, 2017, to the present, as well as all other subscriber and log records associated with the account, which are located at premises owned, maintained, controlled or operated by Google LLC, a provider of electronic communication and remote computing services, headquartered at 1600 Amphitheatre Parkway, Mountain View, California 94043.

ATTACHMENT B2

Section I - Information to be disclosed by Google LLC for search:

1. To the extent that the information described in Attachment A2 is within the possession, custody, or control of the Provider, regardless of whether such information is stored, held or maintained inside or outside of the United States, and including any emails, records, files, logs, or information that has been deleted but is still available to the Provider, or has been preserved pursuant to a request made under 18 U.S.C. § 2703(f), the Provider is required to disclose the following information to the government for each account or identifier listed in Attachment A2:

a. The contents of all e-mails associated with the account, including stored or preserved copies of e-mails sent to and from the account, draft e-mails, the source and destination addresses associated with each e-mail, the date and time at which each e-mail was sent, and the size and length of each e-mail;

b. All records or other information regarding the identification of the account, to include full name, physical address, telephone numbers and other identifiers, records of session times and durations, the date on which the account was created, the length of service, the IP address used to register the account, log-in IP addresses associated with session times and dates, account status, alternative e-mail addresses provided during registration, methods of connecting, log files, and means and source of payment;

c. The types of service utilized;

d. All records or other information stored at any time by an individual using the account, including address books, contact and buddy lists, calendar data, pictures, and files;

e. All records pertaining to communications between the provider and any person regarding the account, including contacts with support services and records of actions taken.

f. For all information required to be disclosed pursuant to this warrant, the physical location or locations where the information is stored.

1 The Provider is hereby ordered to disclose the above information to the government
2 within fourteen days of the issuance of this warrant.

3 **Section II - Information to be seized:**

4 2. All information described above in Section I that constitutes fruits, contraband,
5 evidence, and instrumentalities of violations of Title 18, United States Code, Sections
6 1956(a)(1)(A)(i) and (B)(i), laundering of monetary instruments; and Title 21, United
7 States Code, Sections 841(a)(1) and 846, distribution and conspiracy to distribute
8 controlled substances, those violations involving QIFENG LI, QIWEI LI, XIAMIN
9 HUANG, JUNQIANG WU, and MICHAEL YANG, for each account or identifier listed
10 on Attachment A2, information pertaining to the following matters:

11 a. All content including messages, documents and profile information,
12 attachments, or other data that otherwise constitutes evidence, fruits, and
13 instrumentalities of violations of Title 18, United States Code, Sections 1956(a)(1)(A)(i)
14 and (B)(i); and Title 21, United States Code, Sections 841(a)(1) and 846. Specifically,
15 information pertaining to: the day-to-day operations and logistics of the cultivation and
16 movement of marijuana, including the sale of marijuana, purchasers of marijuana,
17 licenses and/or application for licenses pertaining to marijuana; the shipping, tracking,
18 and delivery of packages containing marijuana; the logistics of managing bulk cash and
19 illicit proceeds, including the laundering, structuring, placement, layering, integration, of
20 illicit proceeds; the procurement of residential properties; the utilities associated with the
21 residential properties; the persons associated with the residential properties and utilities;
22 and communications between QIFENG LI, QIWEI LI, XIAMIN HUANG, JUNQIANG
23 WU, and MICHAEL YANG, and co-conspirators including those who may be involved
24 in third party money laundering to include any preparatory steps taken in furtherance of
25 the overall scheme;

26 b. All content including messages, documents, and profile information,
27 attachments, or other data that serves to identify any persons who use or access the
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1 account specified, or who exercise in any way any dominion or control over the specified
2 account;

3 c. Any address lists, contact lists or other lists associated with the specified
4 account that may identify co-conspirators;

5 d. All subscriber records associated with the specified account, including
6 name, address, local and long distance telephone connection records, or records of
7 session times and durations, length of service (including start date) and types of service
8 utilized, telephone or instrument number or other subscriber number or identity,
9 including any temporarily assigned network address, and means and source of payment
10 for such service) including any credit card or bank account number;

11 e. Any and all other log records, including IP address captures, associated
12 with the specified account; and,

13 f, Any records of communications between Google LLC, and any person
14 about issues relating to the account, such as technical problems, billing inquiries, or
15 complaints from other users about the specified account. This is to include records of
16 contacts between the subscriber and the provider's support services, as well as records of
17 any actions taken by the provider or subscriber as a result of the communication.
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ATTACHMENT C

Sent Date	E-mail Thread Summary	From	To	Affiant's Notes
9/25/17	Handwritten note listing PONY MOVERS LLC, as UBI #604129861 at 14468 57th Ave. S., Tukwila, WA. The agent was named JUNQIANG WU.	kyleli77@hotmail.com	alexv@glostone.com; michaelya ng89@yahoo.com	On 4/30/18, SA Chin utilized the WA Business Licensing Service to verify PONY MOVERS LLC, was associated with the listed UBI number and address. JUNQIANG WU was the only governing member of PONY MOVERS LLC.
9/26/17	Request from Glostone Trucking Solutions for information on PONY MOVERS LLC. The owner for PONY MOVERS LLC, was listed as JUNQIANG WU at 4229 S. Bozeman St, Seattle, WA. A Visa credit card was listed ending in x6793. The card was in the name of Man Fung Lee at 680 Edmonds Ave NE, Renton, WA. The e-mail contact was listed as kyleli77@hotmail.com.	kyleli77@hotmail.com	alexv@glostone.com; michaelya ng89@yahoo.com	As noted, WU was identified as the governing member for PONY MOVERS LLC. On 4/30/18, SA Chin utilized the WA Department of Licensing to verify WU's driver license and his registered address as 4229 S. Bozeman St, Seattle, WA.
9/29/17	Formation record for UBI 604129861. Contact named JUNQIANG WU at 18868 72nd Ave S, Kent, WA. E-mail listed aajacky1122@gmail.com. Phone listed 206-915-7261. Agent listed as Vicky Gan	kyleli77@hotmail.com	vicky@etravelseattle.com	SA Chin determined UBI 604129861 was associated with PONY MOVERS LLC.

10/18/17	Washington State Department of Licensing power of attorney for PONY MOVERS LLC. PONY MOVERS LLC, mailing address listed as PO Box 1650, Clackamas, OR. Phone number 206-512-4730.	michaelyang89@yahoo.com	kyleli77@hotmail.com	
10/31/17	Commercial driver for PONY MOVERS LLC, named Mark Turner, WA DL TURNEMA446BL.	HUB International	kyleli77@hotmail.com ; michaelyang89@yahoo.com	
11/2/17	Oversize Express Inc. at PO Box 937, Vancouver, WA, and contact michaelyang89@yahoo.com bills PONY MOVERS LLC, \$5,500 for transportation services from Seattle to Newark, NJ.	michaelyang89@yahoo.com	kyleli77@hotmail.com	
11/17/17	Rate confirmation for transportation of 5,000 pound cargo trailer from WA to NJ for \$2,200. Carrier listed as Oversize Express Inc., at 17662 SW Galewood Dr, Sherwood, OR. Shipper listed as PONY MOVERS LLC, at 13434 1st Ave. S., Burien, WA. Recipient in NJ is Seven Sea Industry, 35 Lister Ave, Newark, NJ.	michaelyang89@yahoo.com	kyleli77@hotmail.com ; yytrucking88@yahoo.com	By investigation and surveillance, QIFENG LI was known to frequent 13434 1st Ave. S., Burien, WA. Specifically, on 11/4/2017, SA Chin observed QIFENG LI drive from 680 Edmonds Ave NE, Renton, WA to 13434 1st Ave. S. QIFENG LI was then observed assisting a large flatbed truck/tractor trailer back into the parking lot. Later, the truck was seen driving away

				with two wooden pallets of boxes/crates.
11/30/17	WA DOL WU***J*19807 in the name of JUNQIANG WU (DOB: 9/27/1981)	kyleli77@hotmail.com	kyleli77@hotmail.com	As noted, JUNQIANG WU was the governor for PONY MOVERS LLC.
12/1/17	PONY MOVERS LLC, pays \$11.29 for insurance.	kyleli77@hotmail.com	ponymoversllc@gmail.com	
12/1/17	Receipt from Joe Dodd Incorporated to michaelyang89@yahoo.com for six wood international shipping crates at \$450.00	kyleli77@hotmail.com	ponymoversllc@gmail.com	
12/2/17	MICHAEL YANG asks for assistance getting a business license in NJ as a warehouse operation at 70 Blanchard Ave, Newark, NJ, under the name PONY MOVERS LLC.	michaelyang89@yahoo.com	Alexv@glostone.com; kyleli77@hotmail.com	
12/5/17	SROA Belleville, a storage unit in NJ, sends MICHAEL YANG a quote for storage unit.	kyleli77@hotmail.com	michaelyang89@yahoo.com	
12/8/17	This e-mail contained an unexecuted lease agreement sent by Gates Realty Corp. to MICHAEL YANG. The lease agreement was between Gates Realty Corp. and PONY MOVERS LLC, for the 1-year rental of 215 Gates Rd., Unit F, Little Ferry, NJ.	michaelyang89@yahoo.com	kyleli77@hotmail.com	
12/22/17	MICHAEL YANG requests a quote for a forklift for one year at 215 Gates Rd., Little Ferry, NJ. QIFENG LI tells	michaelyang89@yahoo.com	kyleli77@hotmail.com	SA Chin believes that the use of a forklift is essential to the DTO's operations, as the 2017 SROA storage unit

	YANG to purchase a used forklift as it is cheaper.			reservation was cancelled due to the inability to utilize a forklift at that location.
1/7/18	Oversize Express Inc., bill to Pony Mover LLC. Invoice indicates "Pdx, wa" and "Carnegi, PA to Canby, OR"	michaelyan g89@yahoo. com	kyleli77@hotmail.com ; yytrucking 88@yahoo.com	
1/10/18	Oversize Express Inc., bill to PONY MOVERS LLC. Invoice for \$5,010.92 for forklift, auction, internet, service at Portland, labor, radiator, alternator, parts.	michaelyan g89@yahoo. com	kyleli77@hotmail.com	
1/17/18	January and February 2018 monthly rental statement for PONY MOVERS LLC, at 215 Gates Rd., Unit F, Little Ferry, NJ.. Rental fee was \$2,470 per month, plus \$780 common area fee.	michaelyan g89@yahoo. com	kyleli77@hotmail.com	MICHAEL YANG sent QIFENG LI the monthly rental statement for 215 Gates Rd., Unit F, Little Ferry, NJ in the amount of \$3,250.
2/20/18	3/1/18 invoice for PONY MOVERS LLC, rental of 215 Gates Rd., Unit F, Little Ferry, NJ.	michaelyan g89@yahoo. com	kyleli77@hotmail.com	Again, the monthly rental statement was sent by MICHAEL YANG to QIFENG LI in the amount of \$3,250.
2/22/18	HUB International Transportation Insurance Services sent MICHAEL YANG an invoice from Wilshire Insurance Company to PONY MOVERS LLC, at 14468 57th Ave. S., Tukwila, WA. Bill covers 2/15/2018 – 3/15/2018.	michaelyan g89@yahoo. com	kyleli77@hotmail.com	